

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,  
ALLISON MACK, KATHY RUSSELL, and  
LAUREN SALZMAN,

Defendants.

No. 18-cr-204 (NGG) (VMS)

**NOTICE OF MOTION TO DISMISS THE S-2 INDICTMENT  
OR IN THE ALTERNATIVE FOR A BILL OF PARTICULARS**

PLEASE TAKE NOTICE that, upon the annexed Memorandum of Law, dated March 22, 2019, the Declaration of Kathleen E. Cassidy, dated March 22, 2019, and the exhibits appended thereto, Defendant Clare Bronfman moves this Court, before the Honorable Nicholas G. Garaufis, at the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York, for an Order dismissing the S-2 Indictment or, in the alternative, directing the government to provide a bill of particulars, and for such other and further relief as the Court may deem proper.

Dated: March 22, 2019  
New York, New York

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